

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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J.K.J,

Plaintiff,

v.

POLK COUNTY SHERIFF'S DEPARTMENT,  
DARRYL L. CHRISTENSEN,

Case No. 15-cv-428

Defendants,

and

WISCONSIN COUNTY MUTUAL INSURANCE CORPORATION,

Intervenor.

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**INTERVENOR WISCONSIN COUNTY MUTUAL INSURANCE CORPORATION'S  
MOTION TO SEAL DEPOSITION TRANSCRIPTS**

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NOW COMES the Intervenor, Wisconsin County Mutual Insurance Corporation ("WCMIC"), by its attorneys, Axley Brynelson, LLP, by Lori M. Lubinsky, and hereby moves the Court to seal complete copies of the deposition transcripts of J.K.J. and Darryl L. Christensen, which transcripts will be filed upon the Court entering an order granting this Motion, on the grounds that these deposition transcripts contain numerous references to Plaintiff's name, and Plaintiff has filed this action using a pseudonym to protect her identity, as she is a victim of alleged sexual assault.

Dated this 14<sup>th</sup> day of June, 2016.

s/ Lori M. Lubinsky

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